

REMARKS

I. Introduction

Pending claims 1-43 have been examined and are rejected. Specifically, claims 1-6, 14-25 and 33-37 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,078,926 to Jensen et al. (hereinafter “Jensen”) in view of U.S. Patent No. 6,732,331 to Alexander (hereinafter “Alexander”); claims 7-13 and 26-32 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 5,913,205 to Jain et al. (hereinafter “Jain”); and claims 38-43 are rejected under 35 U.S.C. § 102(b) as allegedly being anticipated by Jensen.

As an initial matter, various clarifying and cosmetic amendments are presented for claims 1-43. It is respectfully submitted that the claims would be allowable without the amendments set forth herein. The aforementioned grounds of rejection are overcome as follows.

II. Claim Rejections – 35 U.S.C. § 103(a)

Claim 1 is directed to “a method of representing a multimedia content management object as an item in a relational database adapted for representing multimedia content management data in one or more relational database tables, each of said relational database tables having at least one row with a plurality of columns.” The method includes a unique combination of operations including, *inter alia*, “associating a root component of the content management object to a row in a first relational database table; associating attributes of the root component to corresponding columns of the first relational database table; and associating

additional components of the content management object, if any, to rows in additional relational database tables.”

Jensen, however, relates to populating an object-oriented data structure from data stored in a conventional relational database (Jensen: Abstract). For example, the object-oriented data structure may provide improved performance over the database (Jensen: col. 6, lines 24-26).

The Examiner alleges that Jensen discloses the operation of “associating a root component of the content management object to a row in a first relational database table” by describing an object-to-relational mapping that identifies a portion of a row of a results table as corresponding to a new object (Office Action: page 2; *citing* Jensen: col. 7, lines 8-12).

To the contrary, in Jensen, an object-to-relational mapping specifies how a set of database columns maps to an object data structure (Jensen: col. 8, lines 22-24). Thereafter, a query is used to obtain information from a database in the form of a results table (Jensen: col. 8, lines 41-42). Then, the object-to-relational mapping is used to convert the rows of the results table into a heterogeneous collection of unique objects, such as illustrated in Fig. 6 (Jensen: col. 8, lines 62-64). Furthermore, relationships between the objects in the collection can be established according to the object-to-relational mapping (Jensen: col. 9, lines 3-6).

Thus, Jensen merely describes transforming the results of a complex relational database query (*e.g.*, a “join” query) into a network of heterogeneous inter-related objects contained in an object-oriented data structure (Jensen: col. 4, lines 43-49). Jensen does not disclose that such a transformation operation associates a root component of the content management object to a row

in a first relational database table, as recited in claim 1. Alexander fails to make up for these exemplary deficiencies of Jensen.

In view of the above, claim 1 is patentable over the proposed combination of Jensen in view of Alexander. Claims 14, 20 and 33 recite features similar to those found in claim 1 and, thus, are patentable over Jensen in view of Alexander based on a rationale analogous to that set forth above for claim 1. Consequently, claims 2-6, 15-19, 21-25 and 34-37 are patentable over the proposed combination of Jensen in view of Alexander at least by virtue of their dependency.

III. Claim Rejections – 35 U.S.C. § 102(b)

Claims 7-13 and 26-32 are Not Anticipated by Jain

Claim 7 is directed to “a method of representing a multimedia content management object in a database comprising a high level content model and a low level physical model of multimedia content data, said low level physical model providing a mapping to a data engine.” The method of claim 7 includes the operations of “entering multimedia content data metadata and schema in the low level physical representation” and “mapping the metadata and schema to the data engine.”

As an initial matter, Applicant notes that the Examiner confusingly mentions a Sandoval reference, while citing to portions of Jain (Office Action: page 6).

The Examiner alleges that Jain discloses the operation of “entering multimedia content data metadata and schema in the low level physical representation” by describing that an insertion module 112 is used to add one or more images to a database 132 accessible by a

database engine (Office Action: page 6; *citing* Jain: col. 9, lines 28-30). To the contrary, adding images to a database does not correspond to entering multimedia content data metadata and schema, let alone entering the metadata and schema in a low level physical model that provides a mapping to the data engine.

In view of the above, claim 7 is not anticipated by Jain. Claim 26 recites features similar to those found in claim 7 and, thus, is not anticipated by Jain based on a rationale analogous to that set forth above for claim 1. Consequently, claims 8-13 and 27-32 are not anticipated by Jain at least by virtue of their dependency.

Claims 38-43 are Not Anticipated by Jensen

Claim 38, as amended, recites, *inter alia*, the operation of “associating each component of the content item to a row in a separate relational database table.” Jensen fails to disclose or suggest that components of a content item are associated with rows in separate relational database tables. Therefore, claim 38 is not anticipated by Jensen. Consequently, claims 39-43 are not anticipated by Jensen at least by virtue of their dependency.

IV. Formal Matter

The Examiner provides a signed and initialed copy of the Form PTO-1449 submitted with the IDS filed on March 5, 2002, thereby indicating consideration of the references cited therein.

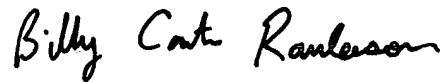
AMENDMENT UNDER 37 C.F.R. § 1.111
U.S. Application No. 10/091,919
Attorney Docket No. A8829 / SVL920010092US1

V. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned attorney at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

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